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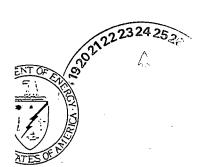
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DOE ORDER # 4700.



## Department of Energy

ROCKY FLATS FIELD OFFICE P.O. BOX 928 GOLDEN, COLORADO 80402-0928

OCT 2 3 1995

95-DOE-10659

Colorado Department of Public Health and Environment HMWMD-B2

4300 Cherry Creek Drive South Denver, Colorado 80222-1530 RECEIVED
T. G. Hedahl

OCT 2 5 1995

Attention: Mr. Harlen Ainscough

Subject: Site Visit, Protected Area Reconfiguration Project

300 Area at Rocky Flats Environmental Technology Site

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Dear Mr. Ainscough:

This letter is to document the results of a visit to the proposed construction site for the Protected Area (PA) Reconfiguration project on October 13, 1995, by Colorado Department of Public Health and Environment (CDPHE) and DOE, Rocky Flats Field Office (RFFO) personnel, including:

Harlen Ainscough, Melani Arai, CDPHE Regina Sarter, Joe Springer, John Rampe, RFFO Mike Lehr, Paul Pigeon, RFFO Support Contractors

The purpose of the visit was familiarization with the proposed project site, especially the areas where the planned new section of Perimeter Intrusion Detection and Assessment System (PIDAS) and associated area of ground disturbance overlap with Individual Hazardous Substance Sites (IHSS's). These IHSS's were established pursuant to the Inter-Agency Agreement (IAG) for RCRA/CERCLA Corrective/Remedial Action at the Rocky Flats Environmental Technology Site (RFETS). The IHSS designations and approximate overlaps with the PA Reconfiguration project area are as follows:

Operable Unit (OU) 13 - 100 Area

IHSS 117.1 - North Chemical Storage Site IHSS 197 - Scrap Metal Sites

The PA Reconfiguration project area of disturbance will overlap only portions of the northerly 30 and 10 feet of IHSS's 117.1 and 197, respectively, where the new PIDAS section will tie in to the existing PIDAS adjacent to the Building 550 Guard Post.

OU 8 - 700 Area

IHSS 172 - Central Avenue Waste Spill

The PA Reconfiguration project area of disturbance will overlap about a 200 foot section of IHSS 172 along Sixth Street where this paved road slopes downhill to the northeast into the B771 area.

ADMIN REGORD

INED 1A-A-000782

Joe Springer noted that actual construction will not begin until Fiscal Year 1998. The PA Reconfiguration project is currently in the planning and environmental review stage, and RFFO wanted CDPHE to be aware of this project plan in relation to the above described IHSS's.

During the site visit, Joe Springer described the types of disturbance that would take place in the IHSS's. In IHSS's 117.1 and 197, the surface would be scarified, consisting of removal of vegetation and organic soil in the top 6 inches of ground, and up to a 2 foot depth of soil may be excavated for installation of cables and/or to lower the surface elevation as preparation for laying a special gravel surface layer in the PIDAS. The excavated soils will be spread within the IHSS's.

In IHSS 172, the paved road surface will remain intact and, on the embankment on the Southeast shoulder of the road, the ground surface will be scarified and the excavated soil spread within the IHSS. Then, an approximately 10 to 25 foot thickness of uncontaminated structural backfill will be placed to raise the grade and create a gently sloping surface for the new PIDAS. The attached topographical map section indicates the boundaries of the IHSS's in the project area, the existing PIDAS fence line and roads, and the approximate limits of the disturbance area for the PA Reconfiguration project.

Regina Sarter pointed out that IHSS's 117.1 and 197 are considered by RFFO to represent very low health and environmental risks, based upon a risk ranking analysis completed recently by the RFETS Integrating Contractor, Kaiser-Hill Company. Harlen Ainscough agreed and noted that the small overlap areas for IHSS's 117.1 and 197 are not of concern to CDPHE. Although IHSS 172 was risk ranked somewhat higher (35th among over 100 Industrial Area IHSS's), it is a candidate for No Further Action along, with 117.1 and 197, because calculated risk levels are low with respect to RCRA and CERCLA risk management policies. Moreover, as noted above, any soils disturbed will remain within the IHSS's, eliminating the potential for spread of contamination. However, the planned fill over IHSS 172 is of more interest to CDPHE since it, and the section of PIDAS to be installed on the fill, represent essentially permanent improvements to a relatively large area of the IHSS that would preclude future remediation of soil contamination.

Paul Pigeon indicated that a few surface soil samples were taken on the shoulder of the road in the IHSS 172 overlap area as part of the Phase I Remedial Investigation for OU 8. Joe Springer indicated that sampling will be conducted in the disturbed area of the IHSS's per RFETS procedures; in addition, an on-site Soil Disturbance Permit will be issued for the entire PA Reconfiguration project prior to construction in the Industrial Area of the Site. Harlen Ainscough recollected that Sixth Street may have been unpaved at the time of the 1968 spill which caused the IHSS 172 designation. He recommended that RFFO consider conducting a limited but focused characterization of the soil beneath the asphalt in the overlap area and re-examine the existing radionuclide results for the OU 8 surface soil samples before proceeding with construction of the PIDAS section.

RFFO will review the historical record on IHSS 172 regarding the road surfacing of Sixth Street when the waste spill occurred and factor that into their sampling plan. RFFO will provide feedback to CDPHE on actions to be taken (such as preconstruction soil sampling) to assure that IHSS/IAG concerns are dealt with in a timely, appropriate manner.

If you have questions or comments on this record of the October 13 visit to the PA Reconfiguration project area, please feel free to contact Regina Sarter (966-7252), Joe Springer (966-4076) or myself (966-6246).

Sincerely

John J. Rampe

Senior Regulatory Advisor

Project Management and Engineering

## Attachment

CC: Melani Arai, CDPHE Jim Hartman, RFFO Mike Karol, RFFO Jessie Roberson, RFFO Matthew McCormick, RFFO Carl Sykes, RFFO Joe Springer, RFFO Regina Sarter, RFFO Dorothy Newell, RFFO Mike Lehr, SAIC Paul Pigeon, RTG Ben Evans, K-H Leon McGovern, K-H William Gomez, K-H Sharon Hardin, K-H

